

# MEMO ENDORSED



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August 1, 2022

## VIA ECF

Honorable Lewis A. Kaplan  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Granted. SO ORDERED.**

/s/ Lewis A. Kaplan (mab)  
Lewis A. Kaplan, U.S. District Judge  
Dated: August 2, 2022

Re: Patricia Rodney v. City of New York, et al., 22-cv-1445 (LAK)

Your Honor:

I am a Senior Counsel in the office of Hon. Sylvia O. Hinds-Radix, Corporation Counsel of the City of New York, representing defendants City of New York, Sgt. Henriquez, and Officer Clement. I write respectfully to request a two week extension of time for the defendants to respond to the First Amended Complaint from August 3, 2022 to August 17, 2022. This is the first such request, to which plaintiff consents.

By way of background, plaintiff brings this action, pursuant to 42 U.S.C. § 1983, alleging false arrest, excessive force, and denial of the right to a fair trial, *inter alia*, against the City of New York, Officer Clemente, Officer Hernandez, and various John Doe officers.

Defendants initially moved to dismiss plaintiff's Complaint on June 27, 2022. (See ECF No. 21-23). Plaintiff, in response, filed a First Amended Complaint on July 20, 2022. (See ECF No. 29). Accordingly, defendants response to the First Amended Complaint would be due on August 3, 2022. The parties have been engaging in discussions regarding plaintiff potentially withdrawing some of the claims. This extension of time would permit the parties to continue these discussions and possibly narrow the claims without motion practice on these issues.

Thank you for your consideration herein.

Respectfully submitted,

/s/

John Schemitsch  
*Senior Counsel*

cc: **VIA ECF**  
Gideon Oliver, Esq.  
Remy Green, Esq.  
*Attorneys for Plaintiff*